

ORIGINAL

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

FILED IN CLERK'S OFFICE
U.S.D.C. - Atlanta

NOV 13 2015

JAMES N. GAVIN, Clerk
By: *[Signature]*
Deputy Clerk

Robert N. Beirne, Jr.,
Plaintiff

CIVIL ACTION
FILE NO: 1:15-cv-03630-LMM-GGB

v.

OCWEN LOAN SERVICING

Defendant

**MOTION FOR EXTENSION OF TIME FOR PLAINTIFF TO RESPOND
TO DEFENDANTS MOTION TO DISMISS COMPLAINT**

COMES NOW, the Plaintiff, Robert N. Beirne, Jr., and pursuant to Local Rule 7.3 (a) and Rule 6, hereby submits this Motion for Extension time for Plaintiff to Respond to Defendants Motion to Dismiss Complaint (Doc. "4"), showing the Court as follows:

1. Defendant OCWEN LOAN SERVICING filed their Motion to Dismiss ("Doc. 4"), on October 21, 2015. Plaintiff was served October 30, 2015.

2. Pursuant to Rule 7.1B of the Local Rules for the Northern District of Georgia Plaintiff's response is currently due to be filed on or before November 13, 2015.

3. This motion is made on the grounds that such an extension of time is reasonable and necessary to afford Plaintiff an opportunity to plead to the Motion to Dismiss the Complaint.

4. Due to the Plaintiff being Pro Se, Plaintiff needs thirty (30) day extension in which to prepare the Plaintiff's Response in Opposition to the Defendants Motion to Dismiss the Complaint.

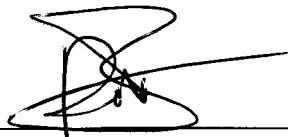
5. No previous extensions of the time for the Plaintiff to respond to the Motion to Dismiss have been sought nor granted. The Defendant will in no manner be prejudiced by this extension of time.

THEREFORE, for the foregoing reasons, the Plaintiff shows that this Court should grant the present Motion for Extension of Time and issue an Order providing that the Plaintiff shall have up to and including December 13, 2015 in

which to file Plaintiff's Response in Opposition to Defendants Motion to Dismiss the Complaint.

A proposed Order is attached hereto for the Court's convenience.

Respectfully submitted, this 10th day of November, 2015,

By: 
Robert N. Beirne, Jr.,
Sui Juris in Propria Persona
1511 Rocky Creek Drive
Woodstock, GA 301889
678-468-8300

CERTIFICATE OF SERVICE

This is to certify that I have this day served upon all parties of record the within and foregoing **PLAINTIFFS MOTION FOR EXTENSION OF TIME** by placing a true and correct copy of same in the United States Mail Priority Mail 2nd day, with prepaid first-class postage affixed thereto, properly addressed as follows:

Federal Court Northern District Atlanta
FEDERAL BUILDING
Clerk of the Court
75 Ted Turner Drive, South West,
Atlanta, Georgia 30303

Amy Lucy Hanna
Baker, Donelson, Bearman, Caldwell & Berkowitz, P.C.-Atl
Suite 1600, Monarch Plaza
3414 Peachtree Street, NE
Atlanta, GA 30326
404-221-6507
Fax: 404-221-6501
Email: ahanna@bakerdonelson.com
ATTORNEY TO BE NOTICED

Respectfully submitted, this 10th day of November, 2015,

By: _____



Robert N. Beirne, Jr.

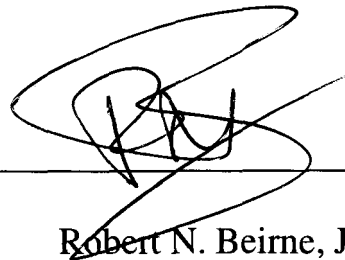
PLAINTIFF'S NOTICE OF MANUAL FILING

Please take notice that Plaintiff has manually filed the following document or thing: **PLAINTIFFS MOTION FOR EXTENSION OF TIME.**

This document was not filed electronically because Plaintiff is excused from filing this document or thing electronically by Administrative Procedures For Filing, Signing and Verifying Pleadings and Papers By Electronic Means, Section III-B. The document or thing has been manually served on all parties.

Respectfully submitted, this 10th day of November, 2015,

By: _____

A handwritten signature in black ink, appearing to read 'R. Beirne, Jr.', is written over a horizontal line. The signature is stylized with large loops and a prominent 'R'.

Robert N. Beirne, Jr.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

Robert N. Beirne, Jr.,
Plaintiff

CIVIL ACTION
FILE NO: **1:15-cv-03630-LMM-GGB**

v.

OCWEN LOAN SERVICING

Defendant

**ORDER EXTENDING THE TIME FOR PLAINTIFF TO RESPOND TO
DEFENDANTS MOTION TO DISMISS COMPLAINT**

HAVING COME ON FOR CONSIDERATION, the Plaintiff's Motion for Extension Time for Plaintiff to Respond to Defendants Motion to Dismiss Complaint, and after due consideration and for good cause shown, the Court GRANTS Plaintiff's Motion requesting an additional thirty (30) days in which to file his response to the Motion to Dismiss the Complaint filed by the Defendant.

THEREFORE, IT IS HEREBY ORDERED that the time for the Plaintiff to file his Response in Opposition to the Defendants Motion to dismiss is extended for a period of thirty days, through and including December 13, 2015.

SO ORDERED this _____ day of November 2015

Judge, United States District Court